

Saint John's University

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Collegeville, MN 56321
320-363-2001*

February 14, 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

Saint John's University submits this letter to express our concerns that changing the federal universal service obligation fee from a percentage based system to a number-based contribution mechanism could have a significant and costly impact upon colleges and universities.

We have calculated that our per year federal universal service obligation would increase from approximately \$4,200 per year to \$26,400 per year if a number based-approach were adopted, assuming that the per-number fee was \$1.00.

Our institution does not have the resources necessary to cover this type of significant increase. If the new contribution method is implemented, the FCC's action may require significant changes in the services that we are able to provide our students, faculty, and staff. Some of those changes could include:

- The elimination of individual telephone service for our on-campus students.
- The reduction of numbers assigned to faculty and staff, thereby limiting their access to voice communications.
- The transition of budgeted funding from educational support and student based programs to Telecommunications.
- Delays in efforts to upgrade and modernize telecommunications facilities on campus.

Our campus supports the need for the federal universal service fund and we understand the need to provide Telecommunication services to all Americans. We however, are concerned that by changing the contribution method to this fund, the FCC could place an extreme burden upon colleges and universities as well as other not-for-profit and charitable organizations.

If a number based contribution method is inevitable, please consider modifying that method to reflect number equivalencies for enterprise customers. This hybrid approach could base *contributions on the number of trunk lines rather than the number of individual numbers assigned on campus.*

St. John's University asks the FCC to proceed with caution in adopting the number-based contribution method, or any other contribution method, that does not account for the specific concerns of colleges and universities.

Thank you for your consideration.

Respectfully submitted,

Colleen Lommel
Director of Telecommunications
Saint John's University